

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 14-09 J
)	
ROBERT PALTROW)	

MOTION FOR EXTENSION OF TIME

AND NOW comes the United States of America, by its attorneys, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and John J. Valkovci, Jr., Assistant United States Attorney for said district, and respectfully requests an extension of all dates set forth in the Court's Sentencing Order (Docket No. 14). In support of this motion, the United States avers as follows:

1. On August 8, 2014, this Court issued an Order (Docket No. 14) scheduling Mr. Paltrow's sentencing hearing for January 8, 2015. The Order also set forth a series of dates by which various actions must be done by the parties and the United States Probation Office.

2. Rule 45(b) of the Federal Rules of Criminal Procedure provides that a period of time may be extended for good cause shown.

3. Counsel for the United States respectfully submits additional time is necessary for the parties to resolve various financial issues relevant to sentencing and to incorporate new or additional information into the Presentence Investigation Report.

4. As a result, the United States respectfully requests an extension of all deadlines set forth in the Court's Sentencing Order. Specifically, that the probation office forward to the Defendant, counsel for the defendant, and the United States a copy of the tentative presentence report, no later than December 3, 2014. Pursuant to the Court's current Order, the Probation Office must forward the presentence report to the parties no later than November 12, 2014.

5. Counsel for Mr. Paltrow, Mark B. Sheppard, Esquire, does not object to the granting of the United States' instant Motion.

WHEREFORE, the United States respectfully requests that, for good cause shown, the Court grant its request for an extension of time.

Respectfully submitted,

DAVID J. HICKTON
United States Attorney

Dated 11/06/2014

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